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Federal Public Defender
2 Nevada State Bar No. 11479
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7 **UNITED STATES DISTRICT COURT**
8 **DISTRICT OF NEVADA**
9

10 UNITED STATES OF AMERICA,
11 Plaintiff,
12 v.
13 CHRISTOPHER MCDERMOTT,
14 Defendant.

Case No. 2:15-cr-222-RFB

**STIPULATION TO CONTINUE
SENTENCING DATE**
(Third Request)

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16 IT IS HEREBY STIPULATED AND AGREED, by and between Daniel G. Bogden,
17 United States Attorney, and Susan Cushman, Assistant United States Attorney, counsel for the
18 United States of America, and Rene L. Valladares, Federal Public Defender, and Raquel Lazo,
19 Assistant Federal Public Defender, counsel for Christopher McDermott, that the sentencing
20 hearing currently scheduled for February 8, 2016 at the hour of 1:30 p.m., be vacated and
21 continued to a date and time convenient to the Court, but no earlier than ninety (90) days.

22 This Stipulation is entered into for the following reasons:

23 1. Defense counsel requires additional time to review the presentence
24 investigation report with Mr. McDermott. Thereafter, defense counsel will require additional
25 time to conduct sentencing mitigation, including prepare any objections and a sentencing
26 memorandum. The defendant is not incarcerated and does not object to the continuance.

2. The parties agree to the continuance.

3. The additional time requested herein is not sought for purposes of delay, but merely to allow counsel for defendant sufficient time within which to be able to complete her mitigation for sentencing purposes.

This is the second request to continue the sentencing date filed herein.

DATED this 21st day of January, 2016.

RENE L. VALLADARES
Federal Public Defender

DANIEL G. BOGDEN
United States Attorney

/s/ Raquel Lazo
By _____

/s/ Susan Cushman
By _____

RAQUEL LAZO
Assistant Federal Public Defender

SUSAN CUSHMAN
Assistant United States Attorney

1 **UNITED STATES DISTRICT COURT**

2 **DISTRICT OF NEVADA**

3 UNITED STATES OF AMERICA,

4 Plaintiff,

5 v.

6 CHRISTOPHER MCDERMOTT,

7 Defendant.

Case No. 2:15-cr-222-RFB

FINDINGS OF FACT, CONCLUSIONS
OF LAW AND ORDER

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10 **FINDINGS OF FACT**

11 Based on the pending Stipulation of counsel, and good cause appearing therefore, the
12 Court finds that:

13 1. Defense counsel requires additional time to review the presentence investigation
14 report with Mr. McDermott. Thereafter, defense counsel will require additional time to conduct
15 sentencing mitigation, including prepare any objections and a sentencing memorandum. The
16 defendant is not incarcerated and does not object to the continuance.

17 2. The parties agree to the continuance.

18 3. The additional time requested herein is not sought for purposes of delay, but
19 merely to allow counsel for defendant sufficient time within which to be able to complete her
20 mitigation for sentencing purposes.

21 This is the second request to continue the sentencing date filed herein
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1 UNITED STATES DISTRICT COURT

2 DISTRICT OF NEVADA

3 UNITED STATES OF AMERICA,

4 Plaintiff,

5 v.

6 CHRISTOPHER MCDERMOTT,

7 Defendant.

Case No. 2:15-cr-222-RFB

ORDER

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10 Based on the pending Stipulation of counsel, and good cause appearing,

11 IT IS THEREFORE ORDERED that the sentencing hearing currently scheduled for
12 Monday, February 8th, 2016 at the hour of 1:30 p.m, be vacated and continued to **May 9,**
13 **2016** at the hour of 10:00 a.m.

14 DATED this 28th day of January, 2016.

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17 RICHARD F. BOULWARE, II
18 UNITED STATES DISTRICT JUDGE
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